

REMARKS

Claims 1-3, 6-12, and 15-22 are presented for further examination. Claims 1 and 10 have been amended and claims 21 and 22 are new.

In the Advisory Action mailed May 29, 2009, the Examiner entered the Amendment filed on April 13, 2009, but rejected the claims in view of previously-cited Haub in view of previously-cited Tokuda.

Applicant respectfully requests reconsideration and further examination of the claims.

Amended claim 1 has been slightly changed to clarify that the method is directed to reducing the effects of second order intermodular distortion in a zero-IF receiver. Claim 1 recites the use of a wide mode filter having a wider frequency range than the normal mode for attenuating signal components to reject second order intermodular distortion. The filter is enabled into the wide-notch filter mode upon the detection of occurrence of intermodular distortion within one or more received baseband signals.

Haub, the primary reference relied upon the Examiner, specifically teaches against filtering as a method of reducing intermodulation interference because such interference may have been frequency translated through a desired channel, allowing them to pass through to the receiver back end. (See Haub, column 2, lines 44-47). Rather, Haub's method is to utilize signal-to-cross modulation interference ratio (SCMIR) in combination with first and second received signal strength measurements to determine the presence of intermodulation interference, and based on the measurement either increase a current to a gain stage or lower the gain of the gain stage and mixer of the receiver. No filtering is used or suggested. (See Haub, column 8, lines 21-36). Moreover, Haub does not address second order intermodulation distortion in a zero-IF receiver. Nowhere does Haub teach or suggest the use of the Eb/Nt measure in combination with an RSSI measure to determine the presence of such distortion.

The secondary reference, Tokuda, fails to teach or suggest using the Eb/Nt measure in combination with the RSSI for detecting intermodulation distortion in a zero-IF receiver in order to eliminate second order intermodulation distortion. As previously argued, Tokuda does not teach or suggest the use of a filter circuit that can be enabled in either a normal

mode or a wide-frequency mode in order to eliminate second order intermodulation distortion in a zero-IF receiver.

Because Haub rejects the use of filtering, one of ordinary skill would find no motivation, teaching, or suggestion in Haub or Tokuda for combining the two. Even if one were motivated to combine these two references as the Examiner suggests, the combination would fail to accurately detect the presence of second order intermodulation distortion in a zero-IF receiver and would fail to enable a dual-mode filter from a normal mode to a wide-notch filter mode to eliminate the second order intermodulation distortion.

For these reasons, applicant respectfully submits that independent claims 1 and 10 are clearly allowable. The corresponding dependent claims are allowable for the features recited therein as well as for the reasons why their corresponding independent claims from which they depend are allowable.

In view of the foregoing, applicant respectfully submits that all of the claims remaining in this application are in condition for allowance. In the event the Examiner disagrees or finds minor informalities that can be resolved by telephone conference, the Examiner is urged to contact the undersigned by telephone at (206) 622-4900 in order to expeditiously resolve prosecution of this application. Consequently, early and favorable action allowing these claims and passing this case to issuance is respectfully solicited.

The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090.

Respectfully submitted,
SEED Intellectual Property Law Group PLLC

/E. Russell Tarleton/
E. Russell Tarleton
Registration No. 31,800

ERT:alb
701 Fifth Avenue, Suite 5400
Seattle, Washington 98104
Phone: (206) 622-4900
Fax: (206) 682-6031
853463.466USPC / 1405224_1.DOC